

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

In re:	)	Case No. 23-10566-KHK
	)	(Chapter 7)
EAGLE PROPERTIES AND	)	
INVESTMENTS LLC	)	
	)	
Debtor.	)	
_____	)	

**NOTICE OF FIRST AND FINAL  
APPLICATION FOR PAYMENT OF  
FEES AND REIMBURSEMENT OF EXPENSES  
OF MAURICE B. VERSTANDIG AND REQUEST  
TO DIRECT DISBURSEMENT OF UNUSED PORTION  
OF RETAINER AND HEARING THEREUPON**

Maurice VerStandig has filed an application seeking compensation in the amount of \$22,365.00 for his work as the former chief restructuring officer of the debtor herein, as well as reimbursement of out-of-pocket expenses in the amount of \$131,60. The total sum being sought is \$22,496.60. The application seeks to collect these monies from a \$30,000.00 retainer being held.

The application also seeks entry of an order directing disbursement of the remaining, unused retainer funds. The application suggests the unused funds be paid over to the Chapter 7 trustee herein, but also acknowledges a schism in topical case law.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

**If you do not wish the Court to grant the motion, or if you want the court to consider your views on the motion, then on or before June 10, 2024, you must file a written response explaining your position with the Court and serve a copy on the movant. UNDER LOCAL BANKRUPTCY RULE 9013-1, UNLESS A WRITTEN RESPONSE IN OPPOSITION TO THIS MOTION AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON THE PARTY WITHIN 21 DAYS OF THE SERVICE OF THIS NOTICE, THE COURT MAY DEEM ANY OPPOSITION WAIVED AND TREAT THE APPLICATION AS CONCEDED.**

**THE HEARING TO CONSIDER THE RELIEF REQUESTED IN THIS APPLICATION IS SCHEDULED TO BE HELD ON JUNE 11, 2024 AT 12:00 PM IN THE U.S. BANKRUPTCY COURT, 200 S. WASHINGTON STREET, ALEXANDRIA, VIRGINIA 22314, IN COURTROOM III.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Respectfully Submitted,

Dated: May 19, 2024

By: /s/ Maurice B. VerStandig  
Maurice B. VerStandig  
1452 W. Horizon Ridge Pkwy., #665  
Henderson, Nevada 89012  
Telephone: (301) 444-4600  
Facsimile: (301) 444-4600  
E-mail: mac@dcbankruptcy.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 19th day of May, 2024, a copy of the foregoing was served electronically upon filing via the ECF system.

I FURTHER CERTIFY that a copy of this notice, but not of the underlying application, is also being sent via First Class Mail, postage prepaid, to all parties on the attached mailing matrix, on May 20, 2024.

/s/ Maurice B. VerStandig  
Maurice B. VerStandig